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UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

In re

ESPERANZA HANSEN GONZALEZ,
Debtor.

Case No. 21-11034-A-7

Chapter 7

DC No. HLF-2

Date: April 27, 2022

Time: 1:30 p.m.

Place: Dept. A, Courtroom 11, 5th Floor
2500 Tulare Street, Fresno
Hon. Jennifer E. Niemann

MOTION TO WITHDRAW AS COUNSEL

This Motion to Withdraw as Counsel for Debtor is made upon the following grounds:

1. Pursuant to Local Bankruptcy Rule 2017-1(e), Justin D. Harris and Harris Law Firm, PC (“**HLF**”) (collectively “**Counsel**”) request that this Court enter an order relieving them of their duties as counsel in this case for Debtor, Esperanza Hansen Gonzalez. This Motion is also made pursuant to California Rules of Professional Conduct, Rules 1.16(a)(2), (b)(4), (d), and (e)(1).
2. An actual conflict of interest exists between Debtor and Counsel which prevents Counsel from continuing the representation and makes Counsel’s withdrawal mandatory under the California Rules of Professional Conduct, Rule 1.16(a)(2). In short, Debtor has accused

1 Counsel of professional negligence, which mandates withdrawal as counsel. In addition, there
2 has been a fundamental breakdown in the attorney-client relationship, which makes it
3 unreasonably difficult to continue with Debtor's representation. Debtor has largely stopped
4 communicating with Counsel, except when threatening counsel and/or accusing counsel of
5 professional negligence. These issues are likewise grounds for withdrawal under California
6 Rules of Professional Conduct, Rule 1.16(b)(4).

7 3. Counsel brought this Motion pursuant to an order shortening time in an effort to
8 avoid prejudice to Debtor as required by California Rules of Professional Conduct, Rule
9 1.16(d).

10 4. Upon being relieved as counsel, Debtor may have copies of client papers and
11 property as contemplated under the California Rules of Professional Conduct, Rule 1.16(e)(1).

12 5. For the foregoing reasons, Counsel requests that this Court grant this Motion
13 effective April 27, 2022, such that Debtor may appear *in propria persona* at the hearing on the
14 Trustee's motion to compromise, etc., and for such other and further relief as the Court deems
15 appropriate.

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17 Dated: April 25, 2022

HARRIS LAW FIRM, PC

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19 By: 
20 Justin D. Harris, Attorneys for
21 Debtor, Esperanza Hansen Gonzalez
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